

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA**

SERGIO GROBLER, INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS SIMILARLY
SITUATED,

Plaintiffs,

v.

INOTIV, INC., ROBERT W. LEASURE, AND
BETH A. TAYLOR,

Defendants.

Case No. 4:22-cv-00045-PPS-JEM

STIPULATION AND [PROPOSED] ORDER

WHEREAS, on June 23, 2022, Plaintiff Sergio Grobler (“Plaintiff”) filed an action, on behalf of a putative class of investors, against Defendants Inotiv, Inc., Robert W. Leasure, and Beth A. Taylor (collectively, “Defendants”), alleging violations of the Securities Exchange Act of 1934 and Rule 10b-5 promulgated thereunder;

WHEREAS, the Private Securities Litigation Reform Act (“PSLRA”), 15 U.S.C. § 78u-4(a)(3)(A)-(B), provides in Exchange Act cases that: (i) not later than 20 days after the date on which the first complaint is filed, Plaintiff shall publish a notice advising members of the purported class of the pendency of the action, (ii) not later than 60 days after the date on which the notice is published, any member of the purported class may move the Court to serve as lead plaintiff, and (iii) not later than 90 days after the date on which notice is published the Court shall appoint the “most adequate plaintiff” as lead plaintiff for the class;

WHEREAS, Plaintiff has published the requisite notice of his Complaint;

WHEREAS, Defendant Inotiv, Inc. has been served and counsel has accepted service on behalf of Mr. Leasure and Ms. Taylor, without waiving any defenses other than sufficiency of service;

WHEREAS, the parties anticipate that after a lead plaintiff is appointed and lead counsel is approved by the Court, an amended complaint will be filed by the lead plaintiff; and

WHEREAS, in the interest of judicial economy, the parties agree that Defendants are not required to move to dismiss or otherwise respond to the Complaint filed by Plaintiff pending the Court's appointment of a lead plaintiff and approval of lead counsel.

NOW, THEREFORE, the parties, through their undersigned attorneys and subject to the Court's approval, stipulate and agree to the following:

1. Defendants are not required to respond to the current operative complaint in the above-captioned action.

2. Within 14 days of appointment of a lead plaintiff by the Court, lead plaintiff and Defendants will submit a briefing schedule for the filing of an amended complaint and the motion to dismiss.

3. Unless leave is granted by the Court, pursuant to 15 U.S.C. § 78u-4(b)(3)(B), all discovery shall be stayed pending resolution of Defendants' motion to dismiss the operative complaint. During the pendency of the discovery stay, Defendants shall comply with the 15 U.S.C. § 78u-4(b)(3)(C)(i) provisions concerning document preservation.

IT IS SO STIPULATED AND AGREED TO THIS 26th DAY OF JULY, 2022.

WILLIAMS & PIATT, LLC

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IT IS SO ORDERED:

Magistrate Judge John E. Martin